



CRV, Reinvented.

Circular CRV Association
1005 12th Street, Lower 1
Sacramento, CA 95814

June 6, 2025

Karen Kayfetz
Branch Chief, Product Stewardship Branch
CalRecycle
1001 I Street
Sacramento, CA 95814

Subject: Responses to Request for Additional Information Necessary Regarding Circular CRV Association's Stewardship Plan

Dear Karen Kayfetz,

Thank you for the opportunity to provide the Department with additional information concerning Circular CRV Association's Dealer Cooperative Stewardship Plan. Enclosed you will find responses to each of the areas for which the Department is seeking additional information, as well as Attachments that accompany those responses.

Additionally, a revised "Dealer Cooperative Stewardship Plan" dated June 2025 that includes all changes discussed in the attached responses was emailed at the time this letter email to the CalRecycle Dealer Cooperative Group email address.

Please feel free to reach out to me at any time to discuss the contents of this document, and I look forward to working through the Approval process with you and your team.

Thank you in advance for your support and consideration.

Sincerely

Brian Phillips

Brian Phillips
Executive Director
Circular CRV Association

cc: Allyson Williams, CalRecycle
Michelle Martin, CalRecycle
Dealer Cooperative team, CalRecycle

**Response to Request for Additional Information Regarding Circular CRV Association's
Dealer Cooperative Stewardship Plan**

Requirement

14 CCR Section 2370(g): "Redemption contractor" means a person redeeming empty beverage containers pursuant to a stewardship plan on behalf of a dealer cooperative.

Additional Information Necessary

Clarify the meaning of the terms "recycling operator," "recycler operator," "redemption site operator," and "operator," or, if applicable, specify that these parties are a "redemption contractor."

The terms "recycling operator," "recycler operator," "redemption site operator," and "operator," used throughout the Dealer Cooperative Stewardship Plan collectively refer to a "redemption contractor" as defined by 14 CCR section 2370(g).

The Dealer Cooperative Stewardship Plan will be amended to remove these various references in favor of the term 'redemption contractor.'

**Response to Request for Additional Information Regarding Circular CRV Association's
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Requirement

14 CCR Section 2370(h): "Redemption location" or "redemption site" means a place at which beverage containers are redeemed on behalf of a dealer cooperative, including, but not limited to, an innovative method of redemption. A redemption location or redemption site is not required to obtain a certification or registration number from the department in order to operate as part of a stewardship program.

Additional Information Necessary

Clarify the meaning of the terms "redemption solution," "recycling site," and "recycling solution," or, if applicable, specify that these terms mean "redemption location" or "redemption site."

The terms "redemption solution," "recycling site," and "recycling solution," used throughout the Dealer Cooperative Stewardship Plan collectively refer to a "redemption location" or "redemption site" as defined by 14 CCR section 2370(h). The Dealer Cooperative Stewardship Plan will be amended to remove these various references in favor of the terms "redemption location" or "redemption site" where appropriate, or removed altogether.

**Response to Request for Additional Information Regarding Circular CRV Association's
Dealer Cooperative Stewardship Plan**

Requirement

14 CCR Section 2375.2(d): Verification of current exemption from taxation under section 501(c)(3) of the federal Internal Revenue Code of 1986.

Additional Information Necessary

Provide the Internal Revenue Service's determination letter verifying Circular CRV Association's current tax-exempt status or provide documentation that corroborates when Circular CRV Association submitted its Form 1023 to the Internal Revenue Service.

Circular CRV Association filed its Form 1023 with the Internal Revenue Service on October 11, 2024. As of June 6, 2025, Circular CRV Association's Form 1023 has not yet been reviewed or approved by the Internal Revenue Service. Attached to this letter, please find "Attachment A" that includes payment confirmation details, including the date, time, tracking numbers, and amount paid at the time of filing of Form 1023. The Dealer Cooperative Stewardship Plan will be amended to include "Attachment A" in Exhibit A. Once the Determination Letter is received, the Dealer Cooperative Stewardship Plan will be amended to include just the Determination Letter.

**Response to Request for Additional Information Regarding Circular CRV Association's
Dealer Cooperative Stewardship Plan**

Requirement

14 CCR Section 2375.2(f): A list of all dealer members in the dealer cooperative, including each dealer's registration number issues pursuant to section 2371.

Additional Information Necessary

Provide the dealer registration numbers for the following four dealer members:

- (1) Surf Supermarket located at 39250 CA 1 in Gualala,
- (2) Ralphs Grocery Co. located at 12842 Ventura Blvd. in Studio City,
- (3) Grocery Outlet located at 1833 Broadway in Redwood City, and
- (4) Trader Joe's located at 14119 Riverside Drive in Sherman Oaks.

Correct the dealer registration numbers for the following seven dealer members:

- (1) Ralph's Grocery Co. located at 1233 N. La Brea in West Hollywood should be DR101509.001,
- (2) Trader Joe's located at 2300 Wilshire Blvd. #101 in Santa Monica should be DR299978.001,
- (3) Trader Joe's located at 11755 W. Olympic Blvd. in Los Angeles should be DR139018.001,
- (4) Trader Joe's located at 475 W. Foothill Blvd. in Claremont should be DR114592.001,
- (5) Trader Joe's located at 17640 Burbank Blvd. in Encino should be DR107680.001,
- (6) Trader Joe's located at 10850 National Blvd. in Los Angeles should be DR89071.001, and
- (7) Trader Joe's located at 363 Carmen Drive in Camarillo should be DR107678.001.

The Registration number for Surf Supermarket located at 39250 CA 1 in Gualala is DR88237.001.

The Registration number for the Ralphs Grocery located at 12842 Ventura Blvd in Studio City is DR116309.001.

The Registration number for the Grocery Outlet located at 1833 Broadway in Redwood City is DR93907.001.

The Registration number for the Trader Joe's located at 14119 Riverside Drive in Sherman Oaks is DR85933.001.

A revised, full copy of "Appendix C" as presented in the Dealer Cooperative Stewardship Plan is attached to this letter as "Attachment B." The missing dealer registration numbers have been included and the seven corrections to the dealer registration numbers requested have been made. Additionally, "Appendix C" and "Appendix G" have been updated in the Dealer Cooperative Stewardship Plan.

Response to Request for Additional Information Regarding Circular CRV Association's Dealer Cooperative Stewardship Plan

Requirement

14 CCR Section 2375.2(g): A list of unserved convenience zones in which the dealer cooperative will provide redemption.

Additional Information Necessary

Provide the zone status of each dealer member's convenience zone.

The status of each dealer member's convenience zone has been added to the revised, full copy of "Appendix C" as presented in the Dealer Cooperative Stewardship Plan and is attached to this letter as "Attachment B."

Circular CRV Association submitted its Dealer Cooperative Stewardship Plan on April 28, 2025. Since that date, the convenience zone status of some of its members have changed or have been noted as incorrect. These changes and corrections are reflected in the revised "Attachment B." The following nine (9) stores have been noted as "Served" and will be removed from the Dealer Cooperative:

- Ralphs Grocery (DR116362.001) located at 23716 El Toro Rd. in Lake Forest*
- Ralphs Grocery (DR87303.001) located at 5225 Canyon Crest Dr in Riverside*
- Ralphs Grocery (DR91258.001) located at 6155 Magnolia Ave in Riverside*
- Costco (DR107698.001) located at 2400 Monument Blvd in Concord*
- Whole Foods Market (DR301879.001) located at 10081 Adams Ave in Huntington Beach*
- Costco (DR91159.001) located at 2100 Dr. MLK Jr. Pkwy in Chico*
- Whole Foods (DR360960.001) located at 12905 Riverside Dr in Sherman Oaks*
- Whole Foods (DR365090.001) located at 3377 La Cienega Blvd in Los Angeles*
- Whole Foods (DR362304.001) located at 5110 Telegraph Ave in Oakland*

A revised, full copy of "Appendix C" as presented in the Dealer Cooperative Stewardship Plan is attached to this letter as "Attachment B," and "Exhibits C and G" of the Dealer Cooperative Stewardship Plan will be amended. Finally, references to the number of Dealer Cooperative members will be corrected to 234, Section 16 of the Dealer Cooperative Stewardship Plan will be amended to reflect a baseline number of containers to redeem of 1,423,065,611, and redemption capacity calculations in Section 16 will be corrected.

**Response to Request for Additional Information Regarding Circular CRV Association's
Dealer Cooperative Stewardship Plan**

Requirement

14 CCR Section 2375.2(j): A timeline for the stewardship plan becoming fully operational once the stewardship plan is approved by the department.

Additional Information Necessary

Clarify the events or milestones that will occur for the stewardship plan to become fully operational, and conditions under which Circular CRV Association will notify CalRecycle that full operational status has been achieved.

Section 10 of Circular CRV Association's Dealer Cooperative Stewardship Plan will be amended to read as follows:

Circular CRV Association estimates the development, placement, and operation of a fully deployed and self-sustaining network of redemption locations consistent with the definition of "fully operational" in 14 CCR Section 2370(e) – specifically, "all elements specified in [the] stewardship plan" – will be eighteen (18) months from the time the Dealer Cooperative Stewardship Plan is approved.

The Dealer Cooperative anticipates using a phased approach to become "fully operational." In the first phase, the Dealer Cooperative estimates that mobile recycling redemption solutions will be deployed in most unserved convenience zones relatively quickly: within 60 days of Stewardship Plan approval. In unserved convenience zones where mobile recycling is not possible, the Dealer Cooperative anticipates it will deploy traditional recycling kiosks, which it anticipates will take an additional 30 days to deploy. Taken together, the Dealer Cooperative anticipates being able to provide redemption opportunities in unserved convenience zones where its Dealer Members operate within 90 days of Plan approval.

Between 0 – 90 days following Plan approval, Circular CRV Association will provide monthly updates to CalRecycle that will include the following information by each unserved convenience zone:

- ***Dealer Name, Dealer Registration Number, and Address, and***
- ***Name of the certified redemption contractor under contract with Circular CRV Association and confirmation the contractor is operating within the convenience zone of the Dealer member in alignment with service and performance standards as outlined in the stewardship plan, and***
- ***Regularly scheduled services are in place, days and hours of operation posted on the Dealer Cooperative's website, and confirmation that redemption services have begun.***

The Dealer Cooperative anticipates it will be able to commence quarterly reporting responsibilities to the Department at the conclusion of the first phase of its rollout.

**Response to Request for Additional Information Regarding Circular CRV Association's
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During the second stage of its rollout, the Circular CRV Association anticipates establishing long-term, sustainable, and innovative CRV redemption methods such as bag drop, RVMs, and depots (that include innovative redemption methods) as part of its network. The Dealer Cooperative anticipates participating in the Redemption Innovation Grant Program administered by CalRecycle to acquire these assets. Table 16.8 of the Dealer Cooperative Stewardship Plan summarizes the number of each innovative redemption method the Dealer Cooperative anticipates deploying with the assistance of the Redemption Innovation Grant funds. The Dealer Cooperative will notify the Department following several milestones during the grant application process, including:

- At the time of receipt of Notice(s) to Proceed related to Circular CRV Association's Redemption Innovation Grant applications (or Notice(s) of Denial of Application); and***
- At the time of deployment and subsequent operation of each innovative method at each location.***

The Dealer Cooperative anticipates the addition of assets acquired through the Redemption Innovation Grant program to the existing network of mobile redemption sites and kiosks will render Circular CRV Association's Stewardship Plan "fully operational" as defined by 14 CCR Section 2370(e) at no more than eighteen (18) months following Plan approval.

**Response to Request for Additional Information Regarding Circular CRV Association's
Dealer Cooperative Stewardship Plan**

Requirement

14 CCR Section 2375.4(a): Each method of redemption offered by the dealer cooperative.

Additional Information Necessary

Clarify or correct the citation to 14 CCR Section 2375.4(e) in the context of the establishment of daily redemption limits for single-feed reverse vending machines.

Section 11 – B1 of Circular CRV Association's Dealer Cooperative Stewardship Plan titled "Operations and Awareness" incorrectly references 14 CCR Section 2375.4(e) when discussing redemption limits per customer, per day. The corrected reference is 14 CCR Section 2375.4(f)(6).

Section 11 – B2 of Circular CRV Association's Dealer Cooperative Stewardship Plan titled "Accepted Materials, Daily Limits, and Redemption Payments" incorrectly references 14 CCR Section 2375(e) when discussing the establishment of load limits on RVMs. The corrected reference is 14 CCR 2375.4(f)(6).

The Dealer Cooperative Stewardship Plan will be amended to correct these references.

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Requirement

14 CCR Section 2375.4(b)(2)(B)(ii): Redemption site contact telephone numbers.

Additional Information Necessary

Confirm that Circular CRV Association's internet website will include contact telephone numbers for redemption sites.

The first paragraph of Section 12 – D of Circular CRV Association's Dealer Cooperative Stewardship Plan titled "Website and Redemption Site Locator" will be amended to read:

*The Dealer Cooperative's website at <http://www.circularcrv.com> will serve as a central resource for public access to all key aspects of the CRV redemption program. Designed with user convenience in mind, the site will provide contact information, such as phone numbers and e-mail addresses to contact Dealer Cooperative staff and recycling operators. An interactive map of CRV redemption opportunities and a filtered search directory to help the public quickly locate redemption sites in the Dealer Cooperative network will also be developed. Users will be able to find additional details on accepted materials, days and hours of operation, **telephone numbers for redemption sites (or telephone numbers for Dealer Cooperative customer service representatives)** and site-specific information.*

Mobile redemption solutions are not typically equipped with phone lines. In all cases, Dealer Cooperative customer service representatives will be able to answer any questions on behalf of its redemption operators. Where direct phone lines exist, the Dealer Cooperative will include on its website a telephone number for redemption sites. If one is not available, the website will list the telephone number that will connect the consumer directly with a Dealer Cooperative customer service representative.

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Requirement

14 CCR Section 2375.4(f)(3): How the dealer cooperative will provide "consumer convenience that is comparable to the requirements of section 14571 and section 14571.9 of the Act" as defined in section 2370.

14 CCR section 2375.4(f)(4): Not all redemption locations are required to redeem all beverage container material types; however, at least one redemption location in each unserved convenience zone covered by the stewardship plan shall redeem all beverage container material types with immediate payment of the refund value a minimum of 10 hours per week, with no less than five of those hours on a Saturday or Sunday between the hours of 9 a.m. and 5 p.m.

14 CCR section 2375.4(f)(6): The stewardship plan may establish a redemption limit per customer per day per redemption method; however, at least one redemption location in each unserved convenience zone covered by the stewardship plan shall redeem all beverage container material types with immediate payment of the refund value up to the daily load limits established in section 2535(f) a minimum of 10 hours per week, with no less than five of those hours on a Saturday or Sunday between the hours of 9 a.m. and 5 p.m.

Additional Information Necessary

Commit to providing consumer convenience in each unserved convenience zone in which Circular CRV Association's dealer members operate by ensuring redemption opportunities meet or exceed the operating hour requirements of 14 CCR section 2370(a)(1) or (2).

Clarify that Circular CRV Association will offer redemption access to consumers for a minimum of five hours per week during periods other than Monday to Friday, from 9 a.m. to 5 p.m., in addition to the minimum requirement of operating at least eight hours per week during a Saturday or Sunday.

Confirm the Circular CRV Association will provide at least one redemption location in each unserved zone that provides immediate payment of the refund value for a minimum on 10 hours per week, including at least five hours on a Saturday or Sunday between 9 a.m. and 5 p.m. and accepting loads up to the daily redemption limits set forth in 14 CCR section 2535(f).

Circular CRV Association commits to providing consumer convenience in each unserved convenience zone in which Circular CRV Association's dealer members operate by ensuring redemption opportunities meet or exceed the operating hour requirements of 14 CCR section 2370(a)(1) or (2) in Section 16.B.8 of the Dealer Cooperative Stewardship Plan. This section will be reassigned to Section 16 – C and be amended to read:

The Dealer Cooperative is committed to ensuring consumer convenience comparable to the requirements of PRC section 14571 and section 14571.9 of the

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California Beverage Container Recycling and Litter Reduction Act, as defined in 14 CCR section 2370(a)(1) or (2) when fully operational, consistent with the definition of "fully operational" in 14 CCR Section 2370(e). This commitment includes providing either of the following in each unserved convenience zone:

- ***Operating for a minimum of 30 hours per week, including at least five (5) hours outside traditional business hours (Monday to Friday 9 a.m. to 5 p.m. or,***
- ***Provide services that include all of the following:***
 - ***At least eight (8) hours per week on one business day (Monday to Friday) and***
 - ***At least five (5) hours per week during periods other than from Monday to Friday from 9 a.m. to 5 p.m. and***
 - ***At least eight (8) hours per week during a Saturday or Sunday.***

This commitment also includes providing at least one redemption location in each unserved convenience zone that provides immediate payment of the refund value for a minimum of ten (10) hours per week, including at least five (5) hours on a Saturday or Sunday between 9 a.m. and 5 p.m. and accepting loads up to the daily redemption limits set forth in 14 CCE section 2535(f).

During the first 12 months following approval of its Stewardship Plan, the Dealer Cooperative will rely heavily on mobile recycling units to provide redemption opportunities in unserved convenience zones where its Dealer members operate. These mobile units will operate for at least eight (8) hours per day, including Saturdays and/or Sundays, will operate on a scheduled, consistent route, and will be hosted on Dealer Member premises that can accommodate them. Where a Dealer Member cannot host a mobile solution, the Dealer Cooperative will assess the feasibility of establishing a mobile solution within a one-mile to one-and-a-half-mile radius of the Dealer Member. The Dealer Cooperative does not anticipate the frequent use of the one-and-a-half-mile radius alternative. These solutions will include one of the following:

- ***Mobile recycling units operating equivalently to those operating at on-site Dealer member operations, or***
- ***Kiosks operating 30 or more hours per week.***

In addition to these mobile and kiosk solutions, the Dealer Cooperative will further improve convenience following the first 12 months of operations through the procurement and implementation of:

- ***Single-feed and bulk-feed reverse vending machines that provide automated and immediate redemption services for consumers to maximize convenience and accessibility, and***
- ***Bag drop systems, which allow consumers to redeem all CRV-eligible materials. While unattended bag drops do not provide immediate payment, the***

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Dealer Cooperative will comply with the three (3) day consumer refund window, and

- *Recycling depots, strategically placed to provide comprehensive coverage and serve as consumer-friendly, sustainable redemption hubs*

The Dealer Cooperative will ensure transparency by clearly communicating redemption site locations and operating hours through:

- *Education and outreach campaign and materials*
- *Online resources, website, and directory accessible to all consumers*

By aligning operations with the standards set forth in 14 CCR § 2370(a), the Dealer Cooperative will ensure compliance with the Beverage Container Recycling and Litter Reduction Act, while delivering accessible, convenient, and sustainable recycling solutions for California.

**Response to Request for Additional Information Regarding Circular CRV Association's
Dealer Cooperative Stewardship Plan**

Requirement

14 CCR Section 2375.6(a): The geographic spread of redemption sites and an explanation for the geographic spread. This shall include the number of redemption sites in each unserved convenience zone in which any of the dealer members operate per person.

Additional Information Necessary

Clarify that all redemption sites will be located within unserved convenience zones in which dealer members operate.

Additionally, clarify how, for each unserved zone in which Circular CRV Association will operate, the geographic spread performance standard will be calculated and reported.

The first paragraph of section 17 of Circular CRV Association's Dealer Cooperative Stewardship Plan titled "Geographic Spread of Redemption Sites" will be amended to read:

*The Dealer Cooperative's approach to its geographic distribution of redemption sites is driven by its commitment to equitable access and consumer convenience in unserved convenience zones **where Dealers that elect to join the Dealer Cooperative operate.** Guided by 14 CCR § 2375.6(a), this Dealer-focused and data-driven placement strategy ensures that **easily accessible redemption sites are conveniently placed in unserved convenience zones in which Dealer Members operate.***

The second to last paragraph of section 17 of Circular CRV Association's Dealer Cooperative Stewardship Plan will be amended to read:

The Dealer Cooperative will calculate the geographic spread performance standard by adding the number of Dealer Members that host a redemption site to the number of Dealer Members not hosting a redemption site, but located within the convenience zone of a Dealer Member that does host a redemption site, and comparing this aggregate to the total number of Dealer Member participants. The Dealer Cooperative has a goal of 97% coverage at all times for its geographic spread performance standard.

For each unserved convenience zone in which the Dealer Cooperative will operate, Circular CRV Association will submit a quarterly report that includes the following:

- The result of the geographic spread performance standard expressed as a percentage.*
- A list of any Dealer Cooperative Member locations that do not host a redemption site and do not have a redemption site in the convenience zone in which they operate. The Dealer Cooperative only anticipates this to occur in rare instances, and then, only for a short period of time.*

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- ***A list of all Dealer Cooperative Members hosting redemption sites; and for each:***
 - ***The type of redemption method(s) used at each redemption site;***
 - ***The number of redemption method(s) at each redemption site; and***
 - ***The number of redemption sites in the unserved convenience zone where the Dealer Member operates.***
- ***A list of all Dealer Cooperative Members not hosting redemption sites; and for each:***
 - ***The number of redemption sites in the unserved convenience zone where the Dealer member operates; and***
 - ***The distance from the Dealer Member to the nearest redemption site within the unserved convenience zone where the Dealer Member operates.***

**Response to Request for Additional Information Regarding Circular CRV Association's
Dealer Cooperative Stewardship Plan**

Requirement

14 CCR Section 2375.6(b): The beverage container redemption capacity per quarter for each unserved convenience zone in which any of the dealer members operate. The overall beverage container volume capacity of the dealer cooperative shall, at a minimum, be sufficient to redeem an amount of beverage containers equal to 100 percent of the beverage containers sold by dealer members into unserved convenience zones in which any of the dealer members operate pursuant to section 2375.4(f)(2). The redemption capacity specified in the stewardship plan may incorporate redemption limits established pursuant to section 2375.4(f)(6).

Additional Information Necessary

Describe how Circular CRV Association will measure and report achievement of its redemption capacity performance standard per quarter for each unserved convenience zone in which its dealer members operate.

The third paragraph of Section 18-A of Circular CRV Association's Dealer Cooperative Stewardship Plan will be amended to read as follows:

*To measure network performance to the 98% operable time benchmark and thereby ensure a 100% redemption capacity for each unserved convenience zone, the Dealer Cooperative will **measure the redemption capacity performance standard for each unserved convenience zone in which its dealer members operate by assessing and reporting quarterly to the Department the following information:***

- ***Measurement of Redemption Site Capacity:***
 - ***The type and quantity of redemption method(s) deployed at each Dealer Member location;***
 - ***The redemption capacity by quarter of each of the redemption method(s) deployed at each Dealer Member location, as submitted in Section 16 of the Dealer Cooperative Stewardship Plan;***
 - ***Calculating the total capacity for all redemption methods at a redemption site by aggregating each machine's quarterly capacity, presented as a number.***
- ***The total number of CRV units sold by each Dealer Member each quarter, presented as a number.***
- ***Compare the quarterly redemption capacity by location to the quarterly number of CRV units sold by location, presented as a percentage.***
- ***Aggregate both the quarterly redemption capacity at all locations and the total number of CRV units sold by all locations, presented as a percentage.***

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Requirement

14 CCR Section 2375.8(a): An itemized list of anticipated costs associated with the administration and implementation of the stewardship plan. The list shall include the monetary amount and purpose on which the funds will be spent. The list shall include, at a minimum, anticipated costs for the categories listed in section 2381(c)(6) for the first four quarters the dealer cooperative will operate.

Additional Information Necessary

Confirm the accuracy of the 2026 year-to-date total anticipated costs for professional services or provide the accurate amount. Provide a more detailed description of the types of expenses that will be tracked in each category.

Circular CRV Association's Budget Estimate for Fiscal Year 2025 – 2026, included in its Dealer Cooperative Stewardship Plan as Exhibit H, contains a mathematical error in the "Q2 '26 YTD" column for 'Professional services." The correct number should be 426 (as opposed to 408). This error will be corrected in the Dealer Cooperative Stewardship Plan.

For further clarity on the various categories presented in the Dealer Cooperative Stewardship Plan:

- **Administrative Costs** includes: Dealer Cooperative employee salaries, associated taxes and employee health and welfare benefits, company travel expense, and insurance coverage (Officers and Directors, Worker's Compensation, etc).
- **Professional Services** includes: services agreements with third party entities to provide various administrative, technical, and field support, legal services, lobbying services, and various consulting fees related to operations, which includes grant writing and submission.
- **Education and Outreach** includes: costs associated with required signage at redemption sites, direct mailings, social media outreach expense, and other methods to communicate to consumers about the availability of redemption methods at Dealer Cooperative Member sites.
- **Technology and Equipment** includes: hardware and software expense for administrative operations, and costs associated with the development, acquisition, and ongoing maintenance of transaction and recordkeeping software capable of fulfilling all reporting requirements as well as capabilities to act as a unified, digital wallet for consumers when engaging with services provided by Circular CRV Association.
- **Partnerships** includes: membership expense for various business and other industry trade associations and groups.
- **Operational costs** includes: repayment of loans made to commence Cooperative operations (loans fully repaid in Q1 – 2025), and all other minor expenses that do not fall into any of the aforementioned categories.

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The Dealer Cooperative Stewardship Plan will be amended to include this additional information in the footnotes included in "Exhibit H."

Response to Request for Additional Information Regarding Circular CRV Association's Dealer Cooperative Stewardship Plan

Requirement

14 CCR Section 2375.8(b): A recommended funding level necessary to cover the stewardship plan budgeted costs and to operate the stewardship program in a prudent and responsible manner. This shall include the target amount for the dealer cooperative's monetary reserves, and the operative deficit amounts that the target reserves will be able to cover, and a description of how surplus funds and operating deficits that exceed those amounts will be addressed by the dealer cooperative during the operation of the stewardship plan.

Additional Information Necessary

Describe how Circular CRV Association will address operating deficits that require additional revenue in excess of the identified \$500,000 reserve amount during the operation of the stewardship plan.

Section 22 of the Dealer Cooperative's Stewardship Plan titled "Funding Level and Reserves" details the measures the Board of Directors would take in the event no Dealer renewed membership for 2026 (a very unlikely event), which would place the Dealer Cooperative in a structural financial deficit. These measures would include "budget adjustments, cost reductions, or additional funding mechanisms." The same holds true for structural deficits caused by any reason.

The fourth paragraph of Circular CRV Association's Dealer Cooperative Stewardship Plan will be amended to read as follows:

*In such a scenario, the Dealer Cooperative would take immediate measures to reduce operating expenses beginning January 1, 2026, and adjust operations to mitigate the deficit without affecting services offered to the consumer. **Structural deficits caused by this or any other reason will be addressed through several means, including the assessment of supplemental membership fees to participating Dealers at a level that will cover the full amount of the deficit, budget adjustments, cost reductions, or additional funding mechanisms approved by the Dealer Cooperative's Board of Directors, ensuring the program remains sustainable and effective for its members and the consumer.** The Dealer Cooperative does not anticipate such an outcome, as enhanced regulatory enforcement is expected to drive additional Dealers Members to join the Dealer Cooperative.*

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Requirement

14 CCR Section 2380(f)(1): A dealer cooperative shall provide immediate access to the department to any original record required by the Act or this chapter. Immediate access may include physical inspection of the record at any redemption site or location identified in the approved stewardship plan.

Additional Information Necessary

Commit to provide immediate access to the department to original records of each beverage container redemption transaction at redemption sites or identify an alternative location(s) where immediate access to original records will be provided.

The fourth paragraph of Section 24 of Circular CRV Association's Dealer Cooperative Stewardship Plan titled "Location of Records" will be amended to read:

*Pursuant to 14 CCR § 2380(f)(1), the Dealer Cooperative will ensure CalRecycle will have immediate access to CRV transaction records stored by recycling operator partners on its behalf. For onsite audits performed by CalRecycle, recycling operator partners will ensure original records are available at redemption sites for immediate review upon request. **Additionally**, records of any CRV redemption transactions will be made immediately available, upon request from CalRecycle, at the following locations:*

- 1. Circular CRV Association
1005 12th Street Lower 2
Sacramento, CA 95814*
- 2. Circular CRV Association
1020 N Lake Street
Burbank, CA 91502*

The Dealer Cooperative will ensure all beverage container redemption records will be retained by the Dealer Cooperative's recycling operator partners for a minimum period of five (5) years as required under 14 CCR § 2085(b).

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Confirmation

Your payment is complete

You can find your receipt in your account payment activity. A confirmation email has been sent to sgardner@downeybrand.com.

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will need the information specified on the Where's My Application page, including your name and employer identification number (EIN), when calling.

Tracking Information

Pay.gov Tracking ID: 27IDG2TV

Agency Tracking ID: 76853917939

Form Name: Application for Recognition of Exemption Under Section 501(c)(3)

Application Name: Form 1023

Payment Information

Payment Type: Debit or credit card

Payment Amount: \$600.00

Transaction Date: 10/11/2024 03:08:09 PM EDT

Payment Date: 10/11/2024

Account Information

Cardholder Name: Pinky Vergara

Card Type: Master Card

Card Number: *****5170

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877-829-5500

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Gardner, Shannon

From: notification@pay.gov
Sent: Friday, October 11, 2024 12:08 PM
To: Gardner, Shannon
Subject: Pay.gov Payment Confirmation: Form 1023



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Application Name: Form 1023
Pay.gov Tracking ID: 27IDG2TV
Agency Tracking ID: 76853917939
Transaction Type: Sale
Transaction Date: 10/11/2024 03:08:09 PM EDT
Account Holder Name: Pinky Vergara
Transaction Amount: \$600.00
Card Type: MasterCard
Card Number: *****5170

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**Attachment B: Revised List of Dealer Cooperative Members
to Amend "Exhibit C" in the Dealer Cooperative Stewardship Plan**

Dealer (Store) Name	Dealer Registration Number	Dealer Street Address	City	State	ZIP Code	Convenience Zone Status
365 by Whole Foods	DR270366.001	2121 Cloverfield Blvd	Santa Monica	CA	90404	Unservd
Amazon Fresh	DR313729.001	1610 W Imperial Hwy Ste 200	La Habra	CA	90631	Unservd
Amazon Fresh	DR313730.001	2229 Foothill Blvd Ste 200	La Verne	CA	91750	Unservd
Amazon Fresh	DR313767.001	3425 E Colorado Blvd	East Pasadena	CA	91107	Unservd
Amazon Fresh	DR313768.001	5101 Lankershim Blvd	North Hollywood	CA	91601	Unservd
Amazon Fresh	DR313771.001	40481 Murrieta Hot Springs Rd	Murrieta	CA	92563	Unservd
Amazon Fresh	DR313775.001	16325 Ventura Blvd	Encino	CA	91436	Unservd
Amazon Fresh	DR313777.001	6235 E Spring St	Long Beach	CA	90808	Unservd
Cardenas Markets	DR102985.001	235 E Julian St	San Jose	CA	95112	Unservd
Cardenas Markets	DR104639.001	1620 N Imperial Ave	El Centro	CA	92243	Unservd
Cardenas Markets	DR146607.001	330 Bellam Blvd	San Rafael	CA	94901	Unservd
Cardenas Markets	DR146608.001	1731 E Bayshore Rd	East Palo Alto	CA	94303	Unservd
Cardenas Markets	DR147201.001	727 1st St	Gilroy	CA	95112	Unservd
Cardenas Markets	DR150574.001	1070 S White Rd	San Jose	CA	95127	Unservd
Cardenas Markets	DR181678.001	31952 Mission Trl	Lake Elsinore	CA	92530	Unservd
Cardenas Markets	DR87905.001	140 W 40th St	San Bernardino	CA	92407	Unservd
Cardenas Markets	DR89532.001	31655 Date Palm Dr	Cathedral City	CA	92234	Unservd
Costco	DR100244.001	4500 W Shaw Ave	Fresno	CA	93722	Unservd
Costco	DR100622.001	2201 Senter Rd	San Jose	CA	95112	Unservd
Costco	DR100688.001	4801 Central Ave	Richmond	CA	94804	Unservd
Costco	DR102360.001	951 Palomar Airport Rd	Carlsbad	CA	92011	Unservd
Costco	DR102414.001	33961 Doheny Park Rd	San Juan	CA	92675	Unservd
Costco	DR102662.001	1000 N Rengstorff Ave	Mountain View	CA	94043	Unservd
Costco	DR106550.001	895 E H St	Chula Vista	CA	91910	Unservd
Costco	DR107096.001	13111 Peyton Dr	Chino Hills	CA	91709	Unservd
Costco	DR107643.001	1099 E Hospitality Ln	San Bernardino	CA	92408	Unservd
Costco	DR107701.001	5101 Business Center Dr	Fairfield	CA	94534	Unservd
Costco	DR107713.001	220 Sylvania Ave	Santa Cruz	CA	95060	Unservd
Costco	DR107718.001	22633 Savi Ranch Pkwy	Yorba Linda	CA	92887	Unservd
Costco	DR108135.001	7100 N Abby St	Fresno	CA	93720	Unservd
Costco	DR112131.001	1800 Cavitt Dr	Folsom	CA	95630	Unservd
Costco	DR112457.001	12155 Tech Center Dr	Poway	CA	92064	Unservd
Costco	DR112588.001	43621 Pacific Commons Blvd	Fremont	CA	94538	Unservd
Costco	DR112697.001	101 N Beach Blvd	La Habra	CA	90631	Unservd
Costco	DR114398.001	1405 W Cameron Ave	Visalia	CA	93277	Unservd
Costco	DR189348.001	28505 Hesperian Blvd	Hayward	CA	94545	Unservd
Costco	DR250868.001	2640 Lomita Blvd	Torrance	CA	90505	Unservd
Costco	DR257006.001	2395 E Lacey Blvd	Hanford	CA	93230	Unservd
Costco	DR353459.001	3881 East Commerce Way	Natomas	CA	95834	Unservd
Costco	DR50054.001	2345 Fenton Pkwy	San Diego	CA	92108	Unservd
Costco	DR88518.001	1616 E Hammer Ln	Stockton	CA	95210	Unservd
Costco	DR89409.001	2030 N Imperial Ave	El Centro	CA	92243	Unservd
Costco	DR91062.001	198 Plaza Dr	Vallejo	CA	94591	Unservd
Costco	DR98790.001	4605 Morena Blvd	San Diego	CA	92117	Unservd
Costco	DR98793.001	1900 Davis St	San Leandro	CA	94577	Unservd
Costco	DR99037.001	2655 El Camino Real	Tustin	CA	92782	Unservd
Food 4 Less	DR111989.001	2420 Cottonwood Dr	El Centro	CA	92243	Unservd
Food 4 Less	DR91814.001	1329 N Lake Ave	Pasadena	CA	91104	Unservd
Food 4 Less	DR92286.001	3210 E Anaheim St	Long Beach	CA	90804	Unservd
Food 4 Less (FoodsCo)	DR111993.001	3657 W Shaw Ave	Fresno	CA	93711	Unservd
Food 4 Less (FoodsCo)	DR93679.001	1465 S Broadway	Santa Maria	CA	93454	Unservd
Grocery Outlet - Clearlake	DR116256.001	14806 Olympic Dr	Clearlake	CA	95422	Unservd
Grocery Outlet - Redwood City	DR93907.001	1833 Broadway St	Redwood City	CA	94063	Unservd
Gualala Supermarket	DR88238.001	39225 S Highway 1	Gualala	CA	95445	Unservd
Holiday Market	DR104213.001	3315 Placer St	Redding	CA	96001	Unservd
Holiday Market	DR302767.001	21656 Higgins Rd	Auburn	CA	95602	Unservd
Holiday Market	DR90994.001	271 Main St	Chester	CA	96020	Unservd
Holiday Market	DR91877.001	16981 Placer Hills Rd	Meadow Vista	CA	95722	Unservd
Oliver's Market	DR100908.001	560 Montecito Ctr	Santa Rosa	CA	95406	Unservd
Ralphs Grocery Co.	DR100042.001	903 S El Camino Real	San Clemente	CA	92672	Unservd
Ralphs Grocery Co.	DR100801.001	1020 University Ave	San Diego	CA	92103	Unservd
Ralphs Grocery Co.	DR101427.001	8657 Villa La Jolla Dr	La Jolla	CA	92037	Unservd
Ralphs Grocery Co.	DR101491.001	4315 Mission Blvd	San Diego	CA	92109	Unservd
Ralphs Grocery Co.	DR101495.001	11727 W Olympic Blvd	Los Angeles	CA	90064	Unservd
Ralphs Grocery Co.	DR101509.001	1233 N La Brea Ave	West Hollywood	CA	90038	Unservd
Ralphs Grocery Co.	DR101532.001	6290 E Pacific Coast Hwy	Long Beach	CA	90803	Unservd
Ralphs Grocery Co.	DR101548.001	1644 Cloverfield Blvd	Santa Monica	CA	90404	Unservd
Ralphs Grocery Co.	DR116294.001	11361 National Blvd	Los Angeles	CA	90064-3796	Unservd
Ralphs Grocery Co.	DR116300.001	3601 E Foothill Blvd	Pasadena	CA	91107-3121	Unservd
Ralphs Grocery Co.	DR116307.001	14440 Burbank Blvd	Van Nuys	CA	91401-4823	Unservd
Ralphs Grocery Co.	DR116320.001	23841 Malibu Rd	Malibu	CA	90265-4644	Unservd
Ralphs Grocery Co.	DR116322.001	32555 Golden Lantern St	Dana Point	CA	92629-3251	Unservd
Ralphs Grocery Co.	DR116328.001	4444 University Pkwy	San Bernardino	CA	92407	Unservd
Ralphs Grocery Co.	DR116336.001	10901 Ventura Blvd	Studio City	CA	91604	Unservd
Ralphs Grocery Co.	DR116347.001	49908 Jefferson St	Indio	CA	92201	Unservd
Ralphs Grocery Co.	DR116365.001	811 Avenida Talega	San Clemente	CA	92673	Unservd
Ralphs Grocery Co.	DR116366.001	10525 4S Commons Dr	San Diego	CA	92127	Unservd
Ralphs Grocery Co.	DR85927.001	14049 Ventura Blvd	Sherman Oaks	CA	91423	Unservd

**Attachment B: Revised List of Dealer Cooperative Members
to Amend "Exhibit C" in the Dealer Cooperative Stewardship Plan**

Dealer (Store) Name	Dealer Registration Number	Dealer Street Address	City	State	ZIP Code	Convenience Zone Status
Ralphs Grocery Co.	DR86201.001	17840 Ventura Blvd	Encino	CA	91316	Unservd
Ralphs Grocery Co.	DR86292.001	1930 N Lakewood Blvd	Long Beach	CA	90815-2714	Unservd
Ralphs Grocery Co.	DR86350.001	201 Madonna Rd	San Luis Obispo	CA	93405	Unservd
Ralphs Grocery Co.	DR86926.001	3345 Sports Arena Blvd	San Diego	CA	92110	Unservd
Ralphs Grocery Co.	DR88376.001	12057 Wilshire Blvd	Los Angeles	CA	90025	Unservd
Ralphs Grocery Co.	DR89933.001	1435 W Chapman Ave	Orange	CA	92868	Unservd
Ralphs Grocery Co.	DR90357.001	1745 Garfield Ave	South Pasadena	CA	91030	Unservd
Ralphs Grocery Co.	DR90564.001	160 N Lake Ave	Pasadena	CA	91101-1836	Unservd
Ralphs Grocery Co.	DR91075.001	260 S La Brea Ave	Los Angeles	CA	90036	Unservd
Ralphs Grocery Co.	DR91318.001	3075 S Archibald Ave	Ontario	CA	91761-9000	Unservd
Ralphs Grocery Co.	DR91697.001	7257 W Sunset Blvd	West Hollywood	CA	90046-3409	Unservd
Ralphs Grocery Co.	DR92571.001	2930 E 4th St	Long Beach	CA	90814	Unservd
Ralphs Grocery Co.	DR93954.001	24871 Del Prado	Dana Point	CA	92629	Unservd
Ralphs Grocery Co.	DR94056.001	10900 Magnolia Blvd	North Hollywood	CA	91601	Unservd
Ralphs Grocery Co.	DR94172.001	21909 Ventura Blvd	Woodland Hills	CA	91364	Unservd
Ralphs Grocery Co.	DR94556.001	305 W Imperial Hwy	Brea	CA	92821	Unservd
Ralphs Grocery Co.	DR116309.001	12842 Ventura Blvd	Studio City	CA	91604-2369	Unservd
Surf Supermarket	DR88237.001	39250 S Highway 1	Gualala	CA	95445	Unservd
Trader Joe's	DR100404.001	1566 Colorado Blvd	Eagle Rock	CA	90041	Unservd
Trader Joe's	DR104528.001	3212 Pico Blvd	Santa Monica	CA	90405	Unservd
Trader Joe's	DR105591.001	475 Foothill Blvd	La Canada	CA	91011	Unservd
Trader Joe's	DR105716.001	263 S La Brea Ave	Los Angeles	CA	90036	Unservd
Trader Joe's	DR105722.001	10130 Riverside Dr	Toluca Lake	CA	91602	Unservd
Trader Joe's	DR105810.001	2545 Pacific Coast Hwy	Torrance	CA	90505	Unservd
Trader Joe's	DR106042.001	1170 Forest Ave	Pacific Grove	CA	93950	Unservd
Trader Joe's	DR107676.001	955 Rancho Pkwy	Arroyo Grande	CA	93420	Unservd
Trader Joe's	DR107678.001	363 Carmen Dr	Camarillo	CA	93010	Unservd
Trader Joe's	DR107680.001	17640 Burbank Blvd	Encino	CA	91316	Unservd
Trader Joe's	DR107681.001	1350 Gateway Blvd	Fairfield	CA	94533	Unservd
Trader Joe's	DR107686.001	604 W Huntington Dr	Monrovia	CA	91016	Unservd
Trader Joe's	DR107687.001	590 Showers Dr	Mountain View	CA	94040	Unservd
Trader Joe's	DR107689.001	1761 S Elena Ave	Redondo Beach	CA	90277	Unservd
Trader Joe's	DR107691.001	1090 University Ave	San Diego	CA	92103	Unservd
Trader Joe's	DR107693.001	3456 S Sepulveda Blvd	West Los Angeles	CA	90034	Unservd
Trader Joe's	DR108132.001	3977 S Higuera St	San Luis Obispo	CA	93401	Unservd
Trader Joe's	DR112025.001	22224 Redwood Rd	Castro Valley	CA	94546	Unservd
Trader Joe's	DR112027.001	8086 E Coast Hwy	Newport Beach	CA	92657	Unservd
Trader Joe's	DR112028.001	345 S Lake Ave	Pasadena	CA	91101	Unservd
Trader Joe's	DR112095.001	467 N Rosemead Blvd	Pasadena	CA	91107	Unservd
Trader Joe's	DR112142.001	5000 Folsom Blvd	Sacramento	CA	95819	Unservd
Trader Joe's	DR112476.001	850 E Bidwell St	Folsom	CA	95630	Unservd
Trader Joe's	DR112477.001	19655 Yorba Linda Blvd	Yorba Linda	CA	92886	Unservd
Trader Joe's	DR112478.001	15466 Los Gatos Blvd	Los Gatos	CA	95032	Unservd
Trader Joe's	DR112557.001	5353 Almaden Expy	San Jose	CA	95118	Unservd
Trader Joe's	DR112815.001	801 East Ave	Chico	CA	95926	Unservd
Trader Joe's	DR113084.001	5451 Lone Tree Wy	Brentwood	CA	94513	Unservd
Trader Joe's	DR113955.001	878 Eastlake Pkwy	Chula Vista	CA	91914	Unservd
Trader Joe's	DR113956.001	17035 Laurel Rd	Morgan Hill	CA	95037	Unservd
Trader Joe's	DR113957.001	1111 Rossi Rd	Templeton	CA	93465	Unservd
Trader Joe's	DR113958.001	635 Coleman Ave	San Jose	CA	95110	Unservd
Trader Joe's	DR114062.001	2401 Truxtun Rd	Point Loma	CA	92106	Unservd
Trader Joe's	DR114592.001	475 W Foothill Blvd	Claremont	CA	91711	Unservd
Trader Joe's	DR115558.001	1000 Glendon Ave	Los Angeles	CA	90024	Unservd
Trader Joe's	DR115747.001	1303 S Bradley Rd	Santa Maria	CA	93454	Unservd
Trader Joe's	DR116134.001	2052 Redwood Hwy	Greenbrae	CA	94904	Unservd
Trader Joe's	DR139015.001	855 El Camino Real	Palo Alto	CA	94301	Unservd
Trader Joe's	DR139016.001	1600 N Vine St	Los Angeles	CA	90028	Unservd
Trader Joe's	DR139018.001	11755 W Olympic Blvd	Los Angeles	CA	90064	Unservd
Trader Joe's	DR139028.001	9850 Hibert St	San Diego	CA	92131	Unservd
Trader Joe's	DR145885.001	31176 Hawthorne Blvd	Rcho Palos Verdes	CA	90275	Unservd
Trader Joe's	DR165493.001	2462 Honolulu Ave	Montrose	CA	91020	Unservd
Trader Joe's	DR166829.001	175 S Fairfax Ave	Los Angeles	CA	90036	Unservd
Trader Joe's	DR242297.001	1640 Garnet Ave	San Diego	CA	92109	Unservd
Trader Joe's	DR258170.001	7310 Santa Monica Blvd	West Hollywood	CA	90046	Unservd
Trader Joe's	DR271974.001	3903 Santa Rita Rd	Pleasanton	CA	94588	Unservd
Trader Joe's	DR276656.001	23741 Calabasas Rd	Calabasas	CA	91302	Unservd
Trader Joe's	DR295964.001	2101 W Imperial Hwy	La Habra	CA	90631	Unservd
Trader Joe's	DR299978.001	2300 Wilshire Blvd	Santa Monica	CA	90403	Unservd
Trader Joe's	DR319516.001	500 S. Broadway	Santa Monica	CA	90401	Unservd
Trader Joe's	DR47873.001	700 Front St	Santa Cruz	CA	95060	Unservd
Trader Joe's	DR85719.001	11976 Ventura Blvd	Studio City	CA	91604	Unservd
Trader Joe's	DR85933.001	14119 Riverside Dr	Sherman Oaks	CA	91423	Unservd
Trader Joe's	DR86852.001	3250 Lakeshore Ave	Oakland	CA	94610	Unservd
Trader Joe's	DR87361.001	570 Munras Ave	Monterey	CA	93940	Unservd
Trader Joe's	DR87369.001	5727 College Ave	Oakland	CA	94618	Unservd
Trader Joe's	DR88858.001	5269 Prospect Rd	San Jose	CA	95129	Unservd
Trader Joe's	DR89071.001	10850 National Blvd	West Los Angeles	CA	90064	Unservd
Trader Joe's	DR89755.001	8657 Villa La Jolla Dr	La Jolla	CA	92037	Unservd

**Attachment B: Revised List of Dealer Cooperative Members
to Amend "Exhibit C" in the Dealer Cooperative Stewardship Plan**

Dealer (Store) Name	Dealer Registration Number	Dealer Street Address	City	State	ZIP Code	Convenience Zone Status
Trader Joe's	DR92878.001	337 3rd St	San Rafael	CA	94901	Unservd
Trader Joe's	DR94475.001	1875 S Bascom Ave	Campbell	CA	95008	Unservd
Trader Joe's	DR95201.001	613 Mission St	South Pasadena	CA	91030	Unservd
Trader Joe's	DR99196.001	3225 Cleveland Ave	Santa Rosa	CA	95403	Unservd
Trader Joe's	DR99493.001	3555 Clares St	Capitola	CA	95010	Unservd
Walmart	DR102696.001	705 College Blvd	Oceanside	CA	92057	Unservd
Walmart	DR108777.001	13487 Camino Canada	El Cajon	CA	92021	Unservd
Walmart	DR109373.001	1919 Davis Street	San Leandro	CA	94577	Unservd
Walmart	DR109494.001	2044 Forest Ave	Chico	CA	95928	Unservd
Walmart	DR109535.001	2100 Vista Way	Oceanside	CA	92054	Unservd
Walmart	DR110307.001	3382 Murphy Canyon Road	San Diego	CA	92123	Unservd
Walmart	DR111444.001	710 Dennery Road	San Diego	CA	92154	Unservd
Walmart	DR111979.001	37140 47th St E	Palmdale	CA	93552	Unservd
Walmart	DR111984.001	7065 N Ingram Ave	Fresno	CA	93650	Unservd
Walmart	DR112300.001	25450 The Old Road	Stevenson Ranch	CA	91381	Unservd
Walmart	DR112574.001	27931 Kelly Johnson Pkwy	Santa Clarita	CA	91355	Unservd
Walmart	DR113096.001	250 S 12th Ave	Hanford	CA	93230	Unservd
Walmart	DR176556.001	1550 Leucadia Blvd	Encinitas	CA	92024	Unservd
Walmart	DR193142.001	3112 Santa Rita Rd	Pleasanton	CA	94566	Unservd
Walmart	DR197834.001	5454 Crossings Dr	Rocklin	CA	95677	Unservd
Walmart	DR201360.001	275 W Ventura Blvd	Camarillo	CA	93010	Unservd
Walmart	DR223827.001	1804 E Ashlan Ave	Fresno	CA	93726	Unservd
Walmart	DR264796.001	8270 Delta Shores Cir	Sacramento	CA	95832	Unservd
Walmart	DR278134.001	4080 W Shaw Ave	Fresno	CA	93722	Unservd
Walmart	DR94013.001	26502 Towne Center Dr	Foothill Ranch	CA	92610	Unservd
Walmart	DR94080.001	170 Town Center Parkway	Santee	CA	92071	Unservd
Walmart	DR99748.001	150 Beach Rd	Marina	CA	93933	Unservd
Whole Foods	DR101460.001	1425 Montana Ave	Santa Monica	CA	90403	Unservd
Whole Foods	DR101475.001	11666 National Blvd	Los Angeles	CA	90064	Unservd
Whole Foods	DR101484.001	4520 Sepulveda Blvd	Sherman Oaks	CA	91403	Unservd
Whole Foods	DR102905.001	8825 Villa La Jolla Dr	La Jolla	CA	92037	Unservd
Whole Foods	DR102952.001	340 3rd St	San Rafael	CA	94901	Unservd
Whole Foods	DR102995.001	711 University Ave	San Diego	CA	92103	Unservd
Whole Foods	DR103016.001	11737 San Vicente Blvd	Los Angeles	CA	90049	Unservd
Whole Foods	DR103019.001	283 Broadway St	Laguna Beach	CA	92651	Unservd
Whole Foods	DR103068.001	6350 W 3rd St	Los Angeles	CA	90036	Unservd
Whole Foods	DR104202.001	800 Del Monte Ctr	Monterey	CA	93940	Unservd
Whole Foods	DR104616.001	1710 41st Ave	Capitola	CA	95010	Unservd
Whole Foods	DR104618.001	201 W Napa St	Sonoma	CA	95476	Unservd
Whole Foods	DR105083.001	405 N Pacific Coast Hwy	Redondo Beach	CA	90277	Unservd
Whole Foods	DR106886.001	21347 Ventura Blvd	Woodland Hills	CA	91364	Unservd
Whole Foods	DR106971.001	100 Sunset Dr	San Ramon	CA	94583	Unservd
Whole Foods	DR107205.001	650 W Shaw Ave	Fresno	CA	93704	Unservd
Whole Foods	DR112032.001	1050 Gayley Ave	Los Angeles	CA	90024	Unservd
Whole Foods	DR112047.001	2201 Wilshire Blvd	Santa Monica	CA	90403	Unservd
Whole Foods	DR112985.001	4800 El Camino Real	Los Altos	CA	94022	Unservd
Whole Foods	DR114029.001	465 S Arroyo Pkwy	Pasadena	CA	91105	Unservd
Whole Foods	DR114066.001	760 S Sepulveda Blvd	El Segundo	CA	90245	Unservd
Whole Foods	DR137317.001	1146 Blossom Hill Rd	San Jose	CA	95118	Unservd
Whole Foods	DR137321.001	390 Coddington Mall	Santa Rosa	CA	95401	Unservd
Whole Foods	DR137327.001	3761 State St	Santa Barbara	CA	93105	Unservd
Whole Foods	DR154250.001	270 Palladio Pkwy	Folsom	CA	95630	Unservd
Whole Foods	DR173456.001	415 Newport Center Dr	Newport Beach	CA	92660	Unservd
Whole Foods	DR181603.001	2600 Via De La Valle	Del Mar	CA	92014	Unservd
Whole Foods	DR193529.001	1531 Froom Ranch Way	San Luis Obispo	CA	93405	Unservd
Whole Foods	DR219591.001	44459 Town Center Way	Palm Desert	CA	92260	Unservd
Whole Foods	DR222954.001	777 The Alameda	San Jose	CA	95126	Unservd
Whole Foods	DR228920.001	5200 Dublin Blvd	Dublin	CA	94568	Unservd
Whole Foods	DR230244.001	12746 W Jefferson Blvd	Playa Vista	CA	90094	Unservd
Whole Foods	DR250954.001	3301 E Imperial Hwy	Brea	CA	92823	Unservd
Whole Foods	DR274541.001	3401 W Olive Ave	Burbank	CA	91505	Unservd
Whole Foods	DR276314.001	2153 W Baseline Rd	Upland	CA	91784	Unservd
Whole Foods	DR296539.001	6400 E Pacific Coast Hwy	Long Beach	CA	90803	Unservd
Whole Foods	DR360967.001	14311 Ventura Blvd	Sherman Oaks	CA	91423	Unservd
Whole Foods	DR86754.001	3000 Telegraph Ave	Berkeley	CA	94705	Unservd
Whole Foods	DR89304.001	7871 Santa Monica Blvd	West Hollywood	CA	90046	Unservd
Whole Foods	DR89307.001	774 Emerson St	Palo Alto	CA	94301	Unservd
Whole Foods	DR90082.001	225 Lincoln Blvd	Venice	CA	90291	Unservd
Whole Foods	DR90365.001	911 Soquel Ave	Santa Cruz	CA	95062	Unservd
Whole Foods	DR91444.001	414 Miller Ave	Mill Valley	CA	94941	Unservd
Whole Foods	DR91889.001	1690 S Bascom Ave	Campbell	CA	95008	Unservd
Whole Foods	DR92137.001	3751 E Foothill Blvd	Pasadena	CA	91107	Unservd
Whole Foods	DR92209.001	15980 Los Gatos Blvd	Los Gatos	CA	95032	Unservd
Whole Foods	DR93171.001	731 E Blithedale Ave	Mill Valley	CA	94941	Unservd
Whole Foods	DR93553.001	331 N Glendale Ave	Glendale	CA	91206	Unservd
Whole Foods	DR94025.001	1181 Yulupa Ave	Santa Rosa	CA	95405	Unservd
Whole Foods	DR97381.001	2655 Pacific Coast Hwy	Torrance	CA	90505	Unservd